KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL **WAI 3553**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the Education and Training Amendment Act and Te Mātaiaho Urgent Inquiry**

CROWN MEMORANDUM FILING RESPONSES TO QUESTIONS IN WRITING

1 May 2026

Te Tari Ture o te Karauna
Crown Law

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Waitangi Tribunal
4 May 2026
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. Parties were directed to file responses to questions in writing for witnesses by midday, Thursday 23 April 2026.[1] By memorandum-directions dated 29 April 2026, the Tribunal identified that some questions were omitted in error. Parties are directed to file responses in writing by 5pm, Friday 1 May 2026.[2]

2. **Attached** to this memorandum are the responses from Crown witnesses:

   2.1 Ellen MacGregor-Reid (#A42);

   2.2 Andrew Jackson (#A43); and

   2.3 Pauline Cleaver (#A44).

1 May 2026

J Watson / T Garimella / L Ewing
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

[1] Wai 3553, #2.6.001.

[2] Wai 3553, #2.7.001.